

REMARKS

Applicant respectfully requests reconsideration of this application in view of the foregoing amendment and following remarks.

Status of the Claims:

Claims 1-25, 51-52, and 55-64 are pending and were rejected. From among these, claims 1, 8, 14 and 21 are independent. By this paper, claims 1 and 14 are amended whereas claims 8-13, 21-22, 52, 58-59, and 63-64 are canceled without prejudice or disclaimer. The cancellation of claims 8-13, 21-22, 52, 58-59, and 63-64 renders the Section 103 rejection of those claims moot. Applicant reserves the right to pursue the canceled claims in a continuing application.

No new matter will be introduced into this application by entry of these amendments. Entry is respectfully requested.

Rejections under 35 U.S.C. § 103(a):

Claims 1-2, 4-5, 7, 14-15, 17-18, 51, 55, 58, and 60 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,298,405 to Ito ("Ito") in view of U.S. Patent No. 7,262,873 to Rasche ("Rasche").¹ Similarly, claims 3, 16, 57 and 62 remain rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ito in view of Rasche, and further in view of U.S. Pub. No. 2003/0007169 to Tanaka ("Tanaka").² Claims 6 and 19 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ito in view of Rasche, and further in view of U.S. Patent No. 6,552,743 to Rissman ("Rissman").³ Claims 56

¹ Paragraph three (page 5) of the Office Action.

² Paragraph four (page 34) of the Office Action.

³ Paragraph five (page 37) of the Office Action.

and 61 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Ito in view of Rasche, and further in view of U.S. Patent No. 6,357,021 to Kitagawa (“Kitagawa”).⁴

The Office Action indicates that since the control data is sent from the VTR to the printer as well as from the printer to the VTR in Ito, it is inherent to determine if the camera is going to control an external device or be controlled by the external device.⁵

Claims 1 and 14 have been amended for further clarification. In particular, amended claim 1 recites, *inter alia*:

“... a detection unit which detects, when a connection between the image sensing apparatus and the external printing apparatus is established, whether control relation between the image sensing apparatus and the external printing apparatus is a first type in which the external printing apparatus is configured in such a way that a memory in the image sensing apparatus can be accessed directly from the external printing apparatus, or a second type in which the external printing apparatus is configured in such a way that processing in the external printing apparatus can be controlled by a controller of the image sensing apparatus, by communication with the external printing apparatus via the interface; and ...”
[Emphasis added].

Claim 14 has been amended in a manner similar to claim 1 as shown above. Support for these amendments may be found throughout the application as originally filed including, for example, Fig. 4 and the relevant portions within the specification. This includes paragraphs [0041] and [0042] of the corresponding published application (e.g., U.S. Patent Publ. No. 2004/0012805 A1).

In one aspect, the present invention detects whether the external printer connected to the image sensing apparatus is operable with a Mass Storage Class mode (i.e., a first mode) or with a New Camera Direct Print mode (i.e., a second mode) when the external printer is connected to the image sensing apparatus. Upon detecting the mode, the processing controller changes the

⁴ Paragraph six (page 40) of the Office Action.

⁵ Page 3 of the final Office Action.

processing procedure such that it conforms with either the first mode or the second mode. With this feature of the invention, the image sensing apparatus can be connected to any printer (i.e., regardless of manufacturer) for a direct printing operation. See, e.g., the background of the invention section of the present application.

Applicant understands that Ito discloses sending control data between the VTR and printer. However, Ito fails to disclose when the control data is sent from the VTR to the printer or vice versa. As Applicant understands it, Ito assumes that the connected printer can be operated with the NCDP mode. As a result, Ito fails to teach “a detection unit” or “a detecting step” that detects whether the control relation between the image sensing apparatus and the external printer apparatus is a first type (e.g., MSC mode) or a second type (e.g., NCDP mode) when a connection between the image sensing apparatus and the external printing apparatus is established as specifically recited in amended claims 1 and 14.

As Applicant explained in the previous amendment (submitted on June 2, 2008), Rasche merely discloses the direct access feature of the memory from the external processing apparatus. Consequently Rasche does not remedy the primary reference (Ito) because Rasche also fails to show or suggest disclosing the “detection unit” or a step of “detecting” as recited in amended independent claims 1 and 14.

Applicant also notes that the Office Action acknowledges that “Ito ‘405 fails to teach the external printing apparatus is configured in such a way that a memory in the image sensing apparatus can be accessed directly from the external processing apparatus.”⁶ In other words, the camera does not communicate with the printer in the Mass Storage Class mode (first mode). In attempting to overcome this deficiency the Office Action refers to Rasche and contends that

⁶ Page 9 of the final Office Action.

Rasche is evidence that this is well-known in the art. However, Rasche merely discloses a photoprinter which is capable of accessing the storage medium on a PC via a connection link. Rasche does not disclose a camera that detects whether a photoprinter is connected in the Mass Storage Class mode (first mode) or in the New Camera Direct Print mode (second mode) and communicates with the photoprinter in the detected mode.

Kitagawa discloses a camera that conforms to the Mass Storage Class of USB. However, the combination of Ito, Rasche, and Kitagawa still does not disclose a camera that is a slave with respect to the printer and has two different modes, a detection unit which detects in which mode of the two the printer is detected, and a processing controller that changes the communication mode between the two modes in accordance with the detection result.

As Applicant understand its, the other cited references (i.e., Tanaka, Rissman and Kitagawa) also fail to show or suggest the present invention as discussed above including the detection unit or the step of detecting as recited in the independent claims, as amended.

Accordingly, each of independent claims 1 and 14, as amended, is believed neither anticipated by nor rendered obvious in view of the cited references (Ito, Rasche, Tanaka, Rissman and Kitagawa), whether taken alone or in combination, for at least the reasons discussed above. Reconsideration and withdrawn of the rejection of claims 1 and 14 under 35 U.S.C. § 103(a) is therefore respectfully requested.

Applicant has chosen in the interest of expediting prosecution of this patent application to distinguish the cited documents from the pending claims as set forth above. These statements should not be regarded in any way as admissions that the cited documents are, in fact, prior art. Also, Applicant has not individually addressed the rejections of the dependent claims because Applicant submits that the independent claims from which they respectively depend are in

condition for allowance as set forth above. Applicant however reserves the right to address such rejections of the dependent claims should such be necessary.

Applicant believes that the application as amended is in condition for allowance and such action is respectfully requested.

AUTHORIZATION

No petitions or additional fees are believed due for this amendment and/or any accompanying submissions. However, to the extent that any additional fees and/or petition is required, including a petition for extension of time, Applicant hereby petitions the Commissioner to grant such petition, and hereby authorizes the Commissioner to charge any additional fees, including any fees which may be required for such petition, or credit any overpayment to Deposit Account No. 13-4500 (Order No. 1232-5080).

An early and favorable examination on the merits is respectfully requested.

Respectfully submitted,
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